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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

STATE OF CALIFORNIA and GAVIN NEWSOM, in his official capacity as Governor of California,

Case No.: 3:25-cv-03372-JSC

DECLARATION OF JESSE BIGNAMI

Plaintiffs.

v.

DONALD J. TRUMP, in his official capacity as President of the United States; **KRISTI NOEM**, in her official capacity as Secretary of Homeland Security; **DEPARTMENT OF HOMELAND SECURITY**; **PETE R. FLORES**, in his official capacity as Acting Commissioner for U.S. Customs and Border Protection; and **U.S. CUSTOMS AND BORDER PROTECTION**.

Defendants

1 I, Jesse Bignami, declare as follows:

2 1. I am over 18 years of age and competent to make this declaration. This declaration is
3 based on my personal knowledge and the records of the California Department of Public Health
4 (CDPH), which are kept in the regular course of business. If called to testify as a witness, I could
5 and would testify to the truth of the matters stated below.

6 2. I am currently employed as the Assistant Division Chief for all Contracts and
7 Purchasing at CDPH.

8 3. I first joined CDPH in November 2020, and since December 2023, I have served as
9 Assistant Division Chief over contracts and purchasing. In this role, I am responsible for
10 overseeing all CDPH contracts and purchasing, including administering and evaluating the
11 ongoing operations for the purchasing, procurement, and contract processing needs of CDPH. As
12 a result, I am generally familiar with most items purchased by CDPH. In addition, depending on
13 my role in supervising and approving various purchases, I am also familiar with some of the more
14 expensive or complex procurements for technical or costly equipment by CDPH.

15 4. I have been asked to compile a list of products that CDPH procures that were
16 manufactured in foreign countries.

17 5. To obtain this information, I reviewed our purchase orders for products we had
18 purchased within the current fiscal year 2024-2025 before April 5, 2025, and then CDPH staff
19 verified where the products were manufactured.

20 6. The following table provides a summary of products I identified as procured through
21 vendors by CDPH within United States, however, the products were manufactured outside the
22 United States. This is not an exhaustive list of products we purchased that were manufactured in
23 foreign countries but rather represents a sample of such products.

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	Department	Product	Country of Origin	Unit Price (\$)	Total Cost FY 24-25 (\$) (est.)
1	CDPH – Center for Infectious Disease (CID)	HIV, HCV, Syphilis Kits	Thailand	HIV: \$237.50; HCV: \$450.00; Syphilis Kits: \$168.00	372,943.50
2	CDPH – Center for Laboratory Sciences	Illumina, NextSeq™ 1000/2000 P2 XLEAPSBS™ Reagent Kit; Illumina IDT for PCR; Illumina Covid Sequence Test	China	Illumina, NextSeq™ 1000/2000 P2 XLEAPSBS™ Reagent Kit: \$2,700; Illumina IDT for PCR: \$1,675; Illumina Covid Sequence Test: \$43,000	199,000.00
3	CDPH – Information Technology Services Division (ITSD)	Cisco Catalyst 9200 Series Switches - GX 93600-GX w/ 8X100G-BiDi. (Cisco Catalyst equipment are networking switches to connect networking devices on the network.)	China	963,155.93	963,155.93
4	CDPH -ITSD	Cisco Catalyst 9200L 48 Port 12xm Gigabit Switch. (Cisco Catalyst	China	138,510.60	138,510.60

1		equipment are networking switches to connect networking devices on the network.)			
2	CDPH – ITSD	HPE Synergy 480 Gen11 Computer Module	Singapore	622,593	622,593.00
3	CDPH – ITSD	HPE ProLiant DL 380 Gen 11 Server	Saudi Arabia	184,216	184,216.00
4	CDPH – ITSD	HP Series 7 Pro 27 Inch QHD Monitor	China	403.73	201,865.00
5	CDPH – ITSD	HP S5 Pro 527pm QHD USB-C Conference Monitor	China	458.25	229,125.00
6	CDPH – CID	Fluarix-Quad - Pediatric Flu Vaccine	Germany	152.16	304,320.00
7	CDPH – CID	Fluarix-Quad - Adult Flu Vaccine	Germany	139.16	3,131,100.00
8	CDPH – ITSD	HP USB-C Dock G5 – (Docking stations for the HP laptops that CDPH uses.)	China	141.50	161,310.00
9	CDPH – ITSD	HP EliteBook 640 14 Inch G 11 Notebook	India	1,729.79	1,971,960.60

24 7. If these products were to immediately become significantly more expensive or harder
 25 to find, there could be significant impacts to different Public Health programs' ability to meet the
 26 needs of the people of California. In some cases, the price increase might exceed the budget of
 27 the program, and they could not proceed with the purchase. In other cases, the increase might put
 28

1 the cost of the items above our delegated authority levels, which would require lengthy approvals
2 by control agencies and thus delays in providing services to the people of California. In addition,
3 harder to find items would mean longer delays as well, and possible supply chain impacts could
4 likewise delay the purchase, receipt or installation of some of these critical items for our
5 laboratories. For example, Illumina instruments and reagents are used throughout the Center for
6 Laboratory Sciences (CLS) for genetic sequencing. The Viral and Rickettsial Disease Laboratory
7 (VRDL), a branch within the CLS, uses such equipment to determine the genome sequence of
8 pathogens such as the COVID virus, influenza virus, MPOX virus, and several others. The data
9 generated helps CDPH identify pathogens, characterize outbreaks, track pathogens/illness in the
10 community, identify sources of pathogen introduction, detect drug resistance markers, and
11 conduct genomic surveillance/supplement conventional public health surveillance.

12 I declare under penalty of perjury under the laws of the United States of America that the
13 foregoing is true and correct.

14 Executed on May 12, 2025, at Sacramento, California.
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17 Jesse Bignami
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